

**AFFIDAVIT IN SUPPORT OF**  
**APPLICATIONS UNDER RULE 41 FOR**  
**SEARCH WARRANTS**

I, Special Agent Christian Louis Cavaliere, first being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the search and seizure of items enumerated in Attachment B which are to be found at the addresses/locations listed in Attachment A.

2. I am a Special Agent with the Drug Enforcement Administration (DEA), United States Department of Justice, and I have served in that capacity since March 2019. I am currently assigned to the Provisional Task Force Group with the Columbia Division of the DEA in Columbia, South Carolina. As a Special Agent of the DEA, I am authorized to conduct investigations and make arrests for violations of Title 18 and Title 21 of the United States Code. I have participated as a Co-Case Agent and Investigative Agent in multiple narcotics investigations which have utilized many enhanced investigative techniques such as Title III wire intercepts, search warrants, and forensic examinations of varying electronic devices. I have been the Affiant for numerous search warrant applications. As an Investigative Agent, I have received advanced specialty training in areas including the interception of telephone communications, fundamentals of telecommunications, electronic forensics, data analysis, cellular analysis, as well as having received extensive training in advanced Narcotics investigations.

3. Through my training, education, and experience, I have become familiar generally with the manner in which illegal drugs are imported and distributed, the method of payment for such drugs, and the efforts of persons involved in such activity to avoid detection by law

enforcement. Additionally, I have received training, both formal and informal, in the operation of drug trafficking, money laundering, and wiretap investigations.

4. Based on my training, experience, and participation in narcotics investigations, I know that:

- a. Drug traffickers and members of criminal enterprises often hold assets in nominee names to conceal any connection between any such asset and themselves, attempting in this way to avoid detection of their illegal activities by law enforcement agencies.
- b. Although their assets are held in nominee names, drug traffickers use and enjoy them, exercising ultimate dominion and control over such assets.
- c. Drug traffickers must maintain at ready access, large amounts of cash in order to maintain and finance their ongoing drug business.
- d. Because drug trafficking on the scale revealed in this investigation is frequently a continuing activity which spans many years, because the traffickers' inventory of controlled substances fluctuates depending on availability and demand, and because drug traffickers commonly front drugs, or provide them on consignment, to their customers, the traffickers often maintain books, receipts, notes, ledgers or some other type of records reflecting such transactions. Drug traffickers and members of criminal enterprises must keep their records in some secure, yet readily accessible, place where they can be used and maintained, such as in homes, offices, places of business, automobiles, safes, or safe deposit boxes. Drug traffickers and members of criminal enterprises must keep these records of their illegal activities beyond the time during which controlled substances are actually in their possession, so that they can maintain contact with their criminal associates for future drug transactions, and so that they can

keep records of prior transactions for which they might be owed or owe inventory or money.

- e. Drug traffickers and members of criminal enterprises commonly hide controlled substances, drug proceeds, and records of their drug transactions in secure locations, such as those mentioned in paragraph (d) above, as well as in offices or places of business, garages, or storage buildings. Similarly, the traffickers and members of criminal enterprises have ready access to these items, and attempt to conceal them from law enforcement agencies.
- f. Drug traffickers and members of criminal enterprises conceal controlled substances, currency, financial instruments, documents relating to financial transactions, precious metals, jewelry, other items of value, and proceeds of drug transactions, all of which constitute evidence of drug trafficking activities. Additionally, such items constitute evidence of transactions establishing the generation, transfer, concealment, and expenditure of large sums of money made from trafficking in controlled substances. Like the items mentioned in paragraph (d) above, traffickers maintain these items in secure, yet convenient, locations, such as their homes, offices, and places of business, garages, storage buildings, automobiles, and safe deposit boxes.
- g. Drug traffickers and members of criminal enterprises commonly maintain addresses or telephone numbers in cellular telephones, books, or papers which reflect names, addresses, and telephone numbers for their drug trafficking and money laundering associates. These items are sometimes in code.
- h. Drug traffickers and members of criminal enterprises frequently have photographs and video recordings of themselves, their associates, their property, firearms, and controlled

substances, which are usually maintained in their homes, offices and places of business. Such photographs and video recordings constitute evidence of their drug trafficking, establishing their connections with items of property with each other, and with drugs and firearms.

- i. Drug traffickers and members of criminal enterprises involved in importation or transportation of controlled substances from source cities generally possess documentation, such as telephone records, correspondence, shipyard receipts, wire transfers, airline ticket receipts, and the like, which pertain to the acquisition, transportation, shipment, or receipt of, or payment for, controlled substances, which is evidence of the traffickers' participation in the illegal drug scheme.
- j. Drug traffickers and members of criminal enterprises often maintain some record of the movement of money, whether it is accomplished by wire or interbank transfer or by a person acting as a courier. Such records, even though they may be in code, are evidence of the traffickers' illegal activities.
- k. Drug traffickers and members of criminal enterprises often use false or fictitious names or corporations or other business entities to launder their drug proceeds and to send shipments of cash or controlled substances through the mail or other delivery services. Traffickers or their Agents sometimes use banks to launder the proceeds from their illegal activities. Funds are frequently transferred between banks and various accounts to conceal their sources and origins. It is also common for them to conduct transactions in amounts such that they avoid the necessity of filing currency transaction reports. Documents or records of any kind reflecting any connection with any such entity or transaction constitute evidence of the trafficker's participation in the illegal scheme.

- l. Drug traffickers and members of criminal enterprises frequently utilize a continuing pattern of activities to launder and conceal drug-generated proceeds and assets, which lasts over a period of years. Drug traffickers use these patterns or schemes to create the appearance of legitimate income so that they can eventually convert the proceeds or assets to themselves or to a nominee under their control. In this way, the traffickers and members of criminal enterprises can enjoy and use their properties while attempting to conceal their illegal activities, which generated the proceeds or assets.
  - m. Courts have recognized that unexplained wealth is probative evidence of crimes motivated by greed, which includes trafficking in controlled substances and illegal schemes to conceal drug-generated proceeds.
  - n. Drug traffickers and members of criminal enterprises who deal in illegal controlled substances often use cellular telephones to maintain contact with and receive messages from their customers and suppliers to further drug distribution activity.
  - o. Drug traffickers and members of criminal enterprises often possess and maintain firearms, ammunition, and bulletproof vests in their homes to protect their drugs and illegal proceeds. The firearms and ammunition are used in violation of Title 18, United States Code, Section 924(c) and are considered tools of the drug trade.
  - p. In addition, I know from previous searches of residences of drug traffickers that they often have items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises.
5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other Agents, officers and witnesses. This affidavit is

intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. The following paragraphs are furnished to establish probable cause in support of the search warrants. I am familiar with this investigation through personal knowledge and through other law enforcement officers. I have good reason to believe and do believe that all of the information provided to me and contained herein is credible and true. I have asserted belief statements throughout this affidavit. These belief statements are based on my training and experience involving complex investigations into criminal enterprises to include violent street gangs, high-level and drug traffickers.

#### **PROPERTIES TO BE SEARCHED**

7. I am seeking authority to search the following locations:

- a. Kitchen Manager's office at 215 Oneil Court,<sup>1</sup> Columbia, South Carolina, 29223 (hereinafter referred to as **LEGACY CARIBBEAN BAR AND GRILL**, a/k/a Mo-Bays) which Affiant believes is the location where Nelson ESCOBAR, a/k/a Macho works as a kitchen manager, and is also a location where members of the Rolling 60s Crips and other violent gangs use to distribute kilogram quantities of cocaine, to discuss gang-related information, and to plan criminal activities. Confidential source information, cooperating defendants, surveillance, wire intercepts and location data records confirm that ESCOBAR and other co-conspirators use **LEGACY CARIBBEAN BAR AND GRILL** to distribute kilogram quantities of cocaine, coordinate gang affiliated meetings, and launder money. Specifically, Agents believe

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<sup>1</sup> According to publicly available credit information, both Experian and Equifax list **LEGACY CARIBBEAN BAR AND GRILL** as an address for Nigel SANDIFORD and Michelle EDWARDS, both of whom are members of the criminal enterprise described herein.

ESCOBAR has an office with a desk at this location where he keeps documents related to the drug trafficking and money laundering activities being conducted at **LEGACY CARIBBEAN BAR AND GRILL**.

- b. 200 Wildwood Lane, Lugoff, South Carolina, 29078 (hereinafter referred to as **LEACH'S RESIDENCE**), which Affiant believes is a residence of Maurice Antwain LEACH, a/k/a Blue. Surveillance, cell phone location data and wire intercepts confirm LEACH utilizes 200 Wildwood Lane to coordinate criminal activity, conduct gang-related telephone calls, to store and safeguard drugs and the proceeds thereof, and to meet with other co-conspirators to discuss their illegal dealings.
- c. 49 Dovecreek, Columbia, South Carolina, 29229 (hereinafter referred to as **ESCOBAR'S RESIDENCE**) which Affiant believes is a residence and stash location of Nelson ESCOBAR. According to the South Carolina Department of Motor Vehicles (SC DMV), ESCOBAR's vehicles are registered to Tenese Gunter,<sup>2</sup> at 49 Dovecreek, Columbia, South Carolina, 29229. Surveillance, wire intercepts and open source records also confirm that 49 Dovecreek is ESCOBAR's residence and a location where he stores kilogram quantities of cocaine for distribution.
- d. 101 Stoneybridge Road, Columbia, South Carolina, 29223 (hereinafter referred to as **SIMON'S RESIDENCE**) which Affiant believes is a residence and primary stash location of Devonte Jabar SIMON, a/k/a Ammo. Surveillance, wire intercepts, and open source records confirm that SIMON utilizes the residence at 101 Stoneybridge

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<sup>2</sup> Gunter is the wife of ESCOBAR. According to the SC DMV, Gunter's registered vehicles are a 2005 Volkswagen GTI (Plate # QSZ510) and a 2011 Chevy Malibu (Plate # PUA290). Both of Gunter's/ESCOBAR'S vehicles are registered to 49 Dovecreek.

Road not only as his residence but also primarily as a stash location to conduct cocaine distribution transactions with co-conspirators.

- e. 4 Pinecroft Court, Columbia, South Carolina, 29229 (hereinafter referred to as **LLOYD'S RESIDENCE**) which Affiant believes to be a residence and primary stash location for Tommy Novack LLOYD, a/k/a T-Lloyd. Surveillance, wire intercepts, and open source records confirm that LLOYD utilizes the residence, 4 Pinecroft Court, as a stash location to conduct cocaine distribution transactions.
- f. 511 Alcott Drive, Apartment 16-A, Columbia, SC 29203 (hereinafter referred to as **BALLARD'S RESIDENCE**) which Affiant believes to be a residence and primary stash location for David Lanard BALLARD, a/k/a Dave. Surveillance, wire intercepts, and confidential human source information confirms that BALLARD utilizes the residence, 511 Alcott Drive, Apartment 16-A, as a stash location to manufacture and sell crack cocaine.

### **BACKGROUND INFORMATION**

8. Beginning in the summer of 2018, the Federal Bureau of Investigation's (FBI) Columbia Violent Gang Task Force (CVGTF), the Drug Enforcement Administration's (DEA), Columbia District Office (CDO), Task Force Group One (TF-1), along with the Richland County Sheriff's Department (RCSD), and Lexington County Sheriff's Department (LCSD) learned through confidential sources, interviews of cooperating defendants, controlled purchases, consensual recorded conversations, pen register and telephone toll record analysis, recent court-authorized Title III wiretaps, and information from local and state law enforcement that Nelson ESCOBAR, Anthony BRITT, Maurice LEACH, Devonte SIMON, Tommy LLOYD, Christopher MELTON, Trinette MELTON, Willie SIMMONS, Michelle EDWARDS, Nigel SANDIFORD,



David BALLARD and numerous other co-conspirators are members of a criminal enterprise consisting of violent gang members in the Columbia area of South Carolina. Agents learned through the aforementioned investigative techniques that this organization's primary source of income is the sale of cocaine, cocaine base (a/k/a crack cocaine), and opioid pills which they deal out of personal residences as well as a restaurant referred to as Mo-Bays (now called **LEGACY CARIBBEAN BAR AND GRILL** located at 215 Oneil Court, Columbia, SC). Additionally, this criminal enterprise uses various local businesses, to include **LEGACY CARIBBEAN BAR AND GRILL**, to launder their drug trafficking proceeds and conceal their means of income.

9. In July of 2018, the FBI CVGTF began investigating an uptick in gang-related violence spanning Lexington, Richland, and Kershaw counties in South Carolina. Local law enforcement agencies informed the FBI that a series of murders, shootings, armed robberies, car thefts, and drug trafficking operations were being committed by Crips<sup>3</sup> gang sets and other affiliated gangs across county jurisdictions around Columbia. Through the investigation, efforts coordinated with the FBI, DEA, and the RCSD identified Maurice LEACH and Anthony BRITT as associates of a Crips set called the "Rolling 60s" and as dealers of kilogram quantities of cocaine and crack cocaine in Columbia area. The investigation resulted in court-authorized wire interceptions of one of BRITT's telephones (803-904-9888, **TARGET TELEPHONE 1**) and one of LEACH's telephones (828-747-5433, **TARGET TELEPHONE 2**).

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<sup>3</sup> The Crips are a nationally known street gang that originated in Los Angeles, California in the 1960s. The Crips are one of the largest and most violent street gangs in the United States, with tens of thousands of active members. The Crips consist of a loosely connected network of individual "sets" that often engage in open warfare with rival gangs and with one another. The Rolling 60s Crips are one of these "sets" and have a nationwide estimated membership of between 6,000 and 8,000 gang members. The FBI estimates that there are approximately 100 active Crips members in the Columbia area of South Carolina.

10. On October 23, 2019, Senior United States District Judge Joseph F. Anderson, Jr. authorized the interception of wire and electronic communications over 803-904-9888, International Mobile Equipment Identity (IMEI) 358007087841543, a cellular telephone with no subscriber, used by Anthony BRITT, (hereinafter referred to as **TARGET TELEPHONE 1**) and 828-747-5433, International Mobile Subscriber Identity (IMSI) 310150717824814, a cellular telephone used by Maurice Antwain LEACH, and subscribed to Orlando Brown at 7132 Parkland Road, Columbia, SC, (herein referred to as **TARGET TELEPHONE 2**). Agents simultaneously applied to receive location data of each target telephone during the interception period.

11. Interceptions over these **TARGET TELEPHONES** commenced on October 24, 2019 and expired on November 22, 2019. As a result of the wire and electronic communications intercepted over **TARGET TELEPHONE 1** and **TARGET TELEPHONE 2**, Agents learned that LEACH and BRITT are both significant cocaine suppliers operating in Columbia, SC. Intercepted calls indicated that both LEACH and BRITT receive kilogram quantities of cocaine at a time which they and their co-conspirators then break down into smaller quantities and/or manufacture into crack cocaine to sell to numerous buyers, many of which are associated with violent gangs. Furthermore, the wire intercepts allowed Agents to identify locations used by BRITT, LEACH, and other co-conspirators that are utilized for drug trafficking activities of this violent criminal enterprise. As a result of intelligence received from the court-authorized wire interceptions of **TARGET TELEPHONE 1** and **TARGET TELEPHONE 2**, a second interception was authorized further identifying targets and locations in this investigation.

12. On November 21, 2019, Judge Anderson authorized the continued interception of wire and electronic communications over **TARGET TELEPHONE 2** as well as the original interception of wire communications over 404-234-6415, a cellular telephone used by Devonte

Jabar SIMON (herein referred to as **TARGET TELEPHONE 3**), 803-348-2297, a cellular telephone utilized by Nelson ESCOBAR, (herein referred to as **TARGET TELEPHONE 4**), and 719-466-1507, a cellular telephone utilized by Christopher MELTON, (herein referred to as **TARGET TELEPHONE 5**). Interceptions over these **TARGET TELEPHONES** commenced on November 22, 2019 and expired on December 20, 2019. Agents again simultaneously applied to receive location data of each target telephone during the interception period. As a result of the wire and electronic communications intercepted over **TARGET TELEPHONE 2, TARGET TELEPHONE 3, TARGET TELEPHONE 4, and TARGET TELEPHONE 5**, Agents learned that BRITT, LEACH, ESCOBAR, SIMON, MELTON, LLOYD, and BALLARD are all significant cocaine suppliers/distributors operating in Columbia. Additionally, Agents identified and/or confirmed locations utilized by this violent criminal enterprise for its drug trafficking operations.

13. During the interception periods of the court-authorized wire intercepts of all **TARGET TELEPHONES**, Agents conducted numerous surveillance operations, as well as analyzed intercepted location data of the **TARGET TELEPHONES**. Agents determined that ESCOBAR, BRITT, LEACH, MELTON, SIMON, LLOYD, and BALLARD used the aforementioned residences to store narcotics and the proceeds thereof, to package, break down and/or manufacture narcotics, and to conduct drug transactions with their suppliers, buyers and each other. Additionally, Agents determined that ESCOBAR is a kitchen manager at **LEGACY CARIBBEAN BAR AND GRILL** and many members of the Rolling 60s Crips and their associates use this business to package and distribute narcotics, to collect and organize drug proceeds, and to organize gang-related illegal activities. Based on intelligence received regarding

the following, Agents were able to identify the aforementioned search locations listed for ESCOBAR, LEACH, SIMON, LLOYD and BALLARD herein this affidavit.

**PROBABLE CAUSE**

**(SOURCE INFORMATION, SEARCH WARRANTS AND INCIDENTS OF VIOLENCE)**

14. Beginning in 2018, Agents began gathering information on ESCOBAR, BRITT, LEACH, MELTON, SIMON, and LLOYD. Through source information, cooperating defendants, and previous local law enforcement investigations, Agents determined that ESCOBAR, LEACH, BRITT, MELTON, SIMON, LLOYD, BALLARD and their co-conspirators were heavily involved in narcotics trafficking. Much of the information also indicated that these subjects were members of violent gangs and were also involved in the possession, transport and use of firearms to safeguard their criminal operations.

15. In May of 2018, Agents began working with a confidential source (hereinafter referred to as Source 1<sup>4</sup>) who informed Agents that LEACH is a member of the Crips who is a close associate of BRITT. According to Source 1, LEACH and BRITT work with ESCOBAR and another individual named Nigel SANDIFORD a/k/a Butta to deal large amounts of cocaine. In early 2018, Source 1 observed LEACH and ESCOBAR in a club in Columbia with a quarter of a kilogram of cocaine. Source 1 also stated that SANDIFORD is the owner of a business called Mo -Bays (later determined to be **LEGACY CARIBBEAN BAR AND GRILL**).

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<sup>4</sup> Source 1 is a former federal defendant who was charged in a drug trafficking conspiracy in a previous FBI investigation. Source 1 agreed to cooperate for consideration on these charges. Source 1 claims to be the former member of the Folk Nation, which is a violent gang present across South Carolina, and as a result, Source 1 has access to a wealth of information related to violent gangs in the area. Affiant has also been able to corroborate much of Source 1's information, and that information has proven to be credible.

16. Agents then discovered that in July of 2016, while conducting a separate investigation into the firearms violations of Nigel SANDIFORD, the ATF, DEA and other law enforcement Agents conducted a search warrant of Mo-Bays at 7314 Parkland Road, Columbia, SC.<sup>5</sup> During the search, Agents found a 12 gauge shotgun, a .45 caliber handgun, shotgun shells, and .45 caliber rounds in the restaurant. Additionally, an assortment of .40 caliber rounds and .9mm rounds were found in SANDIFORD's office. SANDIFORD had previously informed Agents during a proffer interview that he was the owner of Mo-Bays and that he was keeping two handguns in a safe in his office at the restaurant in addition to a shotgun that was behind a door at the same location. SANDIFORD, who was a convicted felon, was arrested and charged federally by the ATF for firearms violations.

17. On March 28, 2017, federal Agents interviewed SANDIFORD pursuant to a federal proffer. During his interview, SANDIFORD told Agents that he had bought Mo-Bays (**LEGACY CARIBBEAN BAR AND GRILL**) in 2010 and that he believed people were selling drugs in the back parking lot of his restaurant. SANDIFORD admitted to being a former drug dealer himself and stated that Michelle EDWARDS was an employee of his at Mo-Bays.

18. Agents also discovered that in May of 2013, cooperating defendant Frank Henderson<sup>6</sup> identified SANDIFORD as a cocaine dealer in Columbia, SC during a proffer

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<sup>5</sup> After SANDIFORD's arrest, Mo-Bays moved from 7314 Parklane Road, Columbia, SC to 215 Oneil Court, Columbia, SC and changed the name from "Mo-Bays" to "**LEGACY CARIBBEAN BAR AND GRILL**". The locations are approximately a quarter of a mile apart but Agents believe it is the same business.

<sup>6</sup> Frank Henderson was convicted on May 10, 2013, for use of a communication facility to facilitate the commission of a felony. His conviction resulted from an FBI wiretap investigation, "Operation Rivershine," which investigated the drug trafficking activities of violent gangs in Columbia, SC. Affiant has been able to corroborate much of Henderson's information and it has proven to be credible.

interview. According to Henderson, SANDIFORD sold cocaine at a place on Parklane Road in Columbia called Mo-Bays. Henderson stated that SANDIFORD and other employees, while on shift working at Mo-Bays, sold narcotics to buyers who came to the restaurant. Henderson identified LEACH as a close associate of SANDIFORD and stated that SANDIFORD sold large quantities of narcotics.

19. On February 26, 2018, RCSD responded to a shooting at 1837 Barbara Drive, Apartment 10D, Columbia, SC, where victim Josue Echevarria had been shot multiple times. According to the victim, ESCOBAR shot him (Echevarria) multiple times with a handgun. Echevarria further stated that ESCOBAR tried to kill him as a result of a dispute that involved Echevarria and Echevarria's girlfriend. Investigators later learned that Echevarria's girlfriend, Jessica Rivera, was the former girlfriend of one of ESCOBAR's drug trafficking partners Jose Angel Romero. On March 2, 2018, a search warrant was conducted by RCSD at **ESCOBAR'S RESIDENCE**. Investigators recovered a shotgun, two handguns, various ammunition, \$37,300 in cash and packaging materials that, based on their size, shape, and composition, were believed to be used for wrapping kilograms of cocaine. These packaging materials later tested positive for cocaine residue. ESCOBAR was charged with Attempted Murder and was released on bond. The charges were later dismissed when Echevarria, the victim of this shooting, fled and was not available as a witness.

20. In November of 2018, Agents began working with a confidential source (hereinafter referred to as Source 2<sup>7</sup>) who informed Agents that he/she was a former member of

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<sup>7</sup> Source 2 was arrested by the Kershaw County Sheriff's Office (KCSO) for burglary in November of 2018. Source 2 agreed to cooperate with Agents for consideration on these charges. Source 2 has previous arrests related to drug charges, burglary, breach of trust and larceny. Additionally, Source 2 informed Agents that the gang had betrayed Source 2 and because of that, Source 2 no

the Rolling 60s Crips and that LEACH, Christopher MELTON a/k/a Gunner, and Willie SIMMONS a/k/a Hurt, who are also members of this gang set, were distributing kilogram quantities of cocaine in the Columbia area. Source 2 provided Agents a wealth of information regarding the Rolling 60s Crips to include rank, structure, hierarchy and criminal operations. Source 2 also identified ESCOBAR as a supplier of cocaine for LEACH and the other members of the gang. Source 2 stated the Crips use a variety of personal residences to conduct their drug trafficking activities. Specifically, Source 2 stated he/she had observed ESCOBAR giving LEACH a kilogram of cocaine at 303 Ferrell Drive (LEACH's trap house) as recently as 2018. Additionally, Source 2 informed Agents that SIMMONS was the leader of the Rolling 60s Crips in Columbia and he (SIMMONS) had recently issued an order to his followers to have a member of the Rolling 60s Crips killed because that member had betrayed the gang.

21. On October 24, 2018, narcotics investigators of RCSD executed a search warrant at 303 Ferrell Drive, Columbia, South Carolina<sup>8</sup>. Investigators recovered a small quantity of heroin, a bullet-proof vest, an M-83 smoke grenade and a firearm among other evidence items. Additionally, investigators photographed various mail, miscellaneous documents, records, and a Bank of America debit card all bearing LEACH's name. Investigators also discovered a Crips Bible during the search. This document contained Crips history, rank structure, a Crips prayer and code words to include references for murder and robberies that are used by the gang. MELTON was seen departing this residence prior to the search warrant and was pulled over by RCSD, who

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longer has any loyalty to the Rolling 60s Crips. Affiant has also been able to corroborate Source 2's information, and that information has proven to be credible.

<sup>8</sup> RCSD has conducted numerous searches at this location since 2018 while investigating numerous criminal activities. As a result of so much law enforcement activity, Agents do not believe that LEACH and his associates are currently using this location as a stash house.

then recovered an additional firearm from MELTON.<sup>9</sup> Investigators arrested MELTON and conducted a *Miranda* interview with him following his arrest. During that interview, MELTON claimed ownership of the heroin and the firearms found during the search.

22. In December of 2018, Agents began working with a confidential source (hereinafter referred to as Source 3<sup>10</sup>) who informed Agents that BRITT and LEACH were dealing kilogram quantities of cocaine that they received from ESCOBAR. Source 3 informed Agents that he/she had received multiple ounces of cocaine at a time on numerous occasions from both BRITT and LEACH going back as far as 2017. Source 3 stated that both BRITT and LEACH worked for ESCOBAR by dealing his cocaine and that ESCOBAR, LEACH, and many of their associates were members of the Rolling 60s Crips. Source 3 also stated that ESCOBAR is a part owner of Mo-Bays (**LEGACY CARIBBEAN BAR AND GRILL**) and that ESCOBAR has a partner named “Butta” (SANIDFORD) who is also involved in ESCOBAR’s drug trafficking operation. According to Source 3, Michelle EDWARDS is the manager of **LEGACY CARIBBEAN BAR AND GRILL** and is the wife of SANDIFORD. Source 3 stated that EDWARDS was laundering ESCOBAR’s cocaine money through **LEGACY CARIBBEAN BAR AND GRILL** on ESCOBAR’s behalf.

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<sup>9</sup> MELTON was arrested and charged by RCSD for manufacturing and possession with intent to distribute Schedule V drugs along with unlawful carrying of a firearm as a result of this incident.

<sup>10</sup> Source 3 was arrested by RCSD in June 2018 for trafficking crack cocaine. Source 3 agreed to cooperate with law enforcement in order to receive consideration for these charges. Source 3 has previous arrests related to drug charges and theft. Source 3 is currently operating as a RCSD narcotics confidential source. Source 3 has lived in Columbia, South Carolina for many years and, as a result of Source 3’s criminal history, Source 3 is able to interact on a personal and business nature with other drug dealers in the area. From July 2018 to July of 2019, Source 3 conducted controlled purchases of drug evidence and engaged in consensually recorded conversations for the CVGTF in this investigation. Affiant has also been able to corroborate Source 3’s information, and that information has proven to be credible.



23. In March of 2019, Agents interviewed cooperating defendant Corey Taylor<sup>11</sup> who provided information on the drug trafficking operations of BRITT, LEACH and ESCOBAR. According to Taylor, both ESCOBAR and BRITT provided kilogram quantities of cocaine to LEACH. Taylor also stated that Michelle EDWARDS is the official owner of Mo-Bays (**LEGACY CARIBBEAN BAR AND GRILL**) and that she allows ESCOBAR and LEACH to use this restaurant as a meeting location for Crips-related activities. Taylor witnessed what he believed was a Crips meeting at **LEGACY CARIBBEAN BAR AND GRILL** wherein ESCOBAR appeared to provide instruction to younger members of the Rolling 60s Crips. Taylor informed Agents that in 2013 or 2014, ESCOBAR approached Taylor while Taylor was at **LEGACY CARIBBEAN BAR AND GRILL** and offered to sell Taylor cocaine. While at that restaurant, Taylor and ESCOBAR then coordinated the future transaction of a kilogram of cocaine. Additionally, Taylor informed Agents that ESCOBAR is violent and the he had informed Taylor that if anyone “snitches” on him, he will “go after” that person’s family and children.

24. On October 1, 2019, LEACH and Levar Baker, another member of the Crips, stabbed Antonio Priester, a suspected Bloods member, at **LEGACY CARIBBEAN BAR AND GRILL**. Wire intercepts later indicated that LEACH and Baker attacked Priester because Priester was a rival of the Crips. RCSD responded to and investigated the stabbing at **LEGACY CARIBBEAN BAR AND GRILL**. While at the restaurant, investigators observed an office adjacent to the kitchen. During the investigation, RCSD interviewed Michelle EDWARDS, the manager of the restaurant. EDWARDS informed RCSD that ESCOBAR is a kitchen manager at

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<sup>11</sup> On March 20, 2018, Taylor was indicted on a federal charge of possession with intent to distribute five kilograms of cocaine. He has since pled and is cooperating pursuant to a plea agreement. Taylor provided information to Agents, which has been proven to be truthful and reliable, and has been corroborated to the best of the Agents’ abilities.

her restaurant. EDWARDS was later intercepted over Title III calls discussing the stabbing and other criminal activities related to **LEGACY CARIBBEAN BAR AND GRILL** on multiple occasions with LEACH. (Affiant believes based on ESCOBAR's position as a kitchen manager, and based upon a call later referenced in paragraph 34 below, that the office observed by RSCD investigators is ESCOBAR's office at **LEGACY CARIBBEAN BAR AND GRILL** where he likely keeps documents related to the drug trafficking and money laundering activities taking place at that location.)

25. As stated in paragraphs 11 and 12, on October 24, 2019, Agents began receiving wire interceptions from cell phones used by the members of this violent criminal enterprise. In addition to drug trafficking, these wire interceptions also indicated that these subjects and their associated gang members are heavily involved in the possession, the transportation, and the use of firearms. Agents also intercepted dozens of calls wherein one or more of these members of this conspiracy discussed the conduct of previous gang or drug-related shootings. Several examples of these phone calls and ensuing incidences are furnished in the following paragraphs.

26. On November 13 and November 14 of 2019, LEACH and Baker discussed harming and/or killing Priester as a result of the stabbing that occurred at **LEGACY CARIBBEAN BAR AND GRILL** (see paragraph 24).

27. On November 25, 2019, LEACH made a series of phone calls to MELTON, SIMMONS and others describing an incident that had just taken place at Buffalo Wild Wings restaurant (located at 10056 Two Notch Road, Columbia, SC). According to LEACH, he had

pulled a handgun on an individual he called “Quice” and ordered “Quice” to come outside to the parking lot of the restaurant so they could “shoot the round”<sup>12</sup>.

28. On November 30, 2019, Agents intercepted a phone call between MELTON and an unknown male during which the unknown male informed MELTON that he felt threatened that he may be robbed at his trap house<sup>13</sup>. During the call, MELTON expressed interest in retaliating violence against these unknown aggressors in response.

29. On November 3, 2019, Agents intercepted a phone call during which LEACH informed his girlfriend, Brittney Woolford, that he owned ten guns. On November 18, 2019, BRITT informed LLOYD that he (BRITT) had been keeping a gun in his vehicle during a drug transaction. Likewise, on December 4, 2019, Agents intercepted a phone call between SIMON and an unknown male during which SIMON indicated the he wanted to sell a “chopper”. SIMON then informed the unknown male that he had “four AR’s and an SK”.<sup>14</sup>

30. On December 17, 2019, Agents intercepted a series of calls that indicated that LEACH, SIMMONS, and a fellow gang member, James MORRIS, were meeting in LEACH’s vehicle to conduct a drug transaction and discuss a gang-related topic. As a result of these wire interceptions, RCSD approached LEACH’s vehicle, which was parked at My House restaurant (located at 7205 Two Notch, Columbia, SC) and arrested LEACH, SIMMONS and MORRIS. A

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<sup>12</sup> “Shoot the round” is a common phrase used by violent gangs that refers to a shooting between rivals.

<sup>13</sup> A “trap house” is a commonly used street term that refers to a residence out of which narcotics are stored and sold.

<sup>14</sup> A “chopper” is a common term used by violent gangs to refer to an assault rifle. Additionally, Affiant believes that “AR’s” and an “SK” are also references to assault rifles.

search of LEACH's vehicle resulted in the seizure of approximately 25 grams of cocaine and three handguns.

31. On January 3, 2020, RCSD conducted a traffic stop on MELTON because MELTON was impeding the flow of traffic and was driving a vehicle without proper registration. A search of the vehicle resulted in the seizure of a 9 millimeter handgun. MELTON was arrested and charged with traffic and firearms violations.

32. On March 26, 2020, RCSD narcotics investigators were conducting surveillance in vicinity of 924 Eastman Street, Columbia, SC in response to a narcotics complaint. Investigators observed BRITT in a black BMW parked in the middle of the road briefly meeting with an unknown person at his driver's side door. Investigators observed that the SC license tag, which was JVu847, was expired. BRITT then departed the area in the BMW and drove toward Interstate 20. After making a series of traffic violations, investigators coordinated a traffic stop on BRITT on Interstate 20. Officers requested a K9 unit, which alerted outside the vehicle and then inside on the glove box and center console.<sup>15</sup> Investigators subsequently located approximately \$13,000 and a black .40 caliber Glock handgun from inside the vehicle. Investigators found an additional \$2,000 on BRITT's person during the search. BRITT was arrested and charged with unlawful carry of a weapon by a violent felon.

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<sup>15</sup> Although no narcotics were found during the search of the vehicle, Agents believe the K9 alerted on the outside BRITT's vehicle and then the glove box and the center console of that vehicle because BRITT had just previously transported a half kilogram of cocaine in that vehicle. Additionally, proceeds of narcotics typically carry the scent of narcotics as they are frequently counted in close proximity to the narcotics during the drug deal. As a result, there was likely cocaine residue in the vehicle which caused the K9 to alert at that time.

33. On June 3, 2020, RCSD responded to a shooting that occurred in vicinity of 303 Ferrell Drive (one of LEACH'S former trap houses). At least one individual was shot during an argument that resulted in a fight and a shooting. An anonymous caller later identified LEACH as a shooter in this incident. RCSD's investigation into this shooting is ongoing.

**PROBABLE CAUSE**

**(WIRETAP EVIDENCE AND SURVEILLANCE)**

**KITCHEN MANAGER'S OFFICE AT LEGACY CARIBBEAN BAR AND GRILL,  
a/k/a Mo-Bays  
(215 Oneil Court, Columbia, South Carolina, 29223)**

34. On October 28, 2019, at approximately 4:10 p.m., during session number 00734, LEACH used **TARGET TELEPHONE 2** to call ESCOBAR, who used **TARGET TELEPHONE 4**. During the phone call, LEACH said, "Alright I'm gonna tell them, you said you got four?" ESCOBAR responded, "One of the bitches short though cuz." LEACH said, "Man, you telling me this, but you the same motherfucker that oh yeah, you can do such and such and such." ESCOBAR responded, "Got nothing over here." LEACH stated, "All that shit you got in the kitchen. All that shit, you about to go in a whole kitchen with baking soda and all kinds of shit. Make it enough. What they said on Friday? Make it enough." ESCOBAR replied, "I done did that shit already, I ain't have none that's why I was (unintelligible audio) like that." LEACH responded, "Well you better go by the house. Or meet me at the house." ESCOBAR stated, "Got three, I'll just send the other one from other people." (Affiant believes that LEACH and ESCOBAR are discussing four ounces of cocaine that ESCOBAR has at **LEGACY CARIBBEAN BAR AND GRILL**. LEACH refers to the kitchen at that restaurant and states that ESCOBAR should be able to use additives on the cocaine ounces that are short with the materials in the **LEGACY CARIBBEAN BAR AND GRILL** kitchen. ESCOBAR stated he already used

the additives there at the restaurant kitchen and LEACH suggested that ESCOBAR go by **ESCOBAR'S RESIDENCE** to get additives if he does not have any more at **LEGACY CARIBBEAN BAR AND GRILL** so they can make the drug sale.)

35. On October 28, 2019, at approximately 11:04 p.m., during session number 00819, LEACH used **TARGET TELEPHONE 2** to call Michelle EDWARDS, who used telephone number 803-466-2486. During the phone call, EDWARDS stated, "Wait a minute, getting drunk outside of Legacy?" LEACH said, "Yeah I just inboxed you. Cuz nobody don't know my truck, so that's why I text you like Auntie you up? Cuz I was fixing to be like can I get something to eat?...So I see Dino in the car, Dino driving in the back. So I'm like, what the fuck? So I'm calling him like bro come outside, but he ain't picking up. Oh that's why you ain't picking up cuz you in there playing (unintelligible audio) with him." EDWARDS responded, "Cuz I just text him and told him to put some money up that I had left on his desk. And I text him right before you called me." LEACH stated, "Well, Dino damn sure in there." (Affiant believes that LEACH informed EDWARDS about a drug deal that had occurred between Darius Mims, a/k/a Dino<sup>16</sup> and ESCOBAR at **LEGACY CARIBBEAN BAR AND GRILL**. EDWARDS then informed LEACH that she had left money on ESCOBAR's desk at **LEGACY CARIBBEAN BAR AND GRILL** for ESCOBAR to store for her. Based on this and the information above in paragraph 24, Agents believe that ESCOBAR is a kitchen manager at **LEGACY CARIBBEAN BAR AND GRILL** and as a result he has an office with a desk where he keeps documents related to the drug trafficking

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<sup>16</sup> During the investigation, Agents intercepted multiple calls between Mims and ESCOBAR in which they discussed the transaction of large quantities of cocaine. Cooperating defendants have previously identified Mims as an associate of ESCOBAR and a cocaine dealer in the Columbia area.

and money laundering activities he and others are conducting at **LEGACY CARIBBEAN BAR AND GRILL.**)

36. On November 22, 2019, at approximately 10:17 p.m., during session number 00012, on **TARGET TELEPHONE 4**, ESCOBAR received a call from telephone number 803-376-7039, a number believed to be used by Mims. During the call, Mims said, “I’m outside, in the front, like when you come out, to your uh, left. I’m in my car.” ESCOBAR replies, “Alright.” (Affiant believes this call is a drug deal in which Mims called ESCOBAR to let ESCOBAR know Mims was outside so ESCOBAR could bring the drugs outside to him in the parking lot. Location data for **TARGET TELEPHONE 4** on November 22, 2019, at approximately 10:15 p.m.<sup>17</sup> showed that ESCOBAR was at **LEGACY CARIBBEAN BAR AND GRILL.**)

37. On November 23, 2019, at approximately 4:27 a.m., during session number 00015, ESCOBAR used **TARGET TELEPHONE 4** to call LEACH who used **TARGET TELEPHONE 2**. During the call, ESCOBAR stated, “Yeah my heart my heart nigga. No matter what I do or what the next nigga do for me.” LEACH responded, “Bro I promise you bro, I’m not barking at you.” ESCOBAR stated, “Gruff at Legacy cuz. And my heart my heart, I was just telling you bro, I ain’t barking at you neither. Like, my heart my heart. Can’t nobody touch, you go to Legacy, can’t nobody touch you. Gruff, can’t nobody say the boss is nothing nigga.” LEACH responded, “Yeah.” ESCOBAR stated, “Like that’s my house you dig?” LEACH stated, “That’s Butta’s<sup>18</sup> spot. Like that’s your big brother. I respect.” ESCOBAR stated, “I’m there more than home.” (Affiant believes that during this call, ESCOBAR and LEACH were discussing

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<sup>17</sup> According to the provider, the location of ESCOBAR’s phone had a certainty factor of 1,057 m at 10:15 p.m. However, at approximately 9:59 p.m. on the same date, ESCOBAR’s phone was also located at **LEGACY CARIBBEAN BAR AND GRILL** with a certainty factor of 9m.

<sup>18</sup> “Butta” is Nigel SANDIFORD.

**LEGACY CARIBBEAN BAR AND GRILL.** When ESCOBAR stated that no one could “touch” LEACH at **LEGACY CARIBBEAN BAR AND GRILL** he meant that this restaurant is a safe haven for LEACH and his drug trafficking activities. ESCOBAR further stated that he (ESCOBAR) was the boss and **LEGACY CARIBBEAN BAR AND GRILL** is ESCOBAR’S “house” meaning the area that he controls. Lastly, when LEACH referred to **LEGACY CARIBBEAN BAR AND GRILL** being “Butta’s spot”, he was indicating the SANDIFORD still was an owner of this restaurant.)

38. On November 26, 2019, at approximately 5:58 p.m., during session 00095, ESCOBAR used **TARGET TELEPHONE 4** to receive a call from 803-376-7039, a phone number believed to be used by Mims. During the call, Mims asked, “Did (unintelligible audio) done made it to work?” ESCOBAR answered, “Yep.” Mims responded, “Alright, I’ll be up there in a second.” Later during the call, Mims stated, “No man you know I wanted to make shit right first. Bro I didn’t want you to feel some type of way.” Later during the call, ESCOBAR stated, “You gave me five and had three in your backpack. You was like man I don’t want to leave the shit in the car man.” (Affiant believes that Mims and ESCOBAR were discussing a previous drug transaction that had occurred at **LEGACY CARIBBEAN BAR AND GRILL** during which Mims had brought \$8,000 into the restaurant and gave ESCOBAR \$5,000 because he did not want to leave the money unattended in his vehicle). According to location data received from **TARGET TELEPHONE 4**, at approximately 6:21 p.m.,<sup>19</sup> ESCOBAR was at **LEGACY CARIBBEAN BAR AND GRILL.**

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<sup>19</sup> According to the provider, the location of ESCOBAR’S phone had a certainty factor of 14m at 6:21 p.m.



39. On November 28, 2019, at approximately 10:15 p.m., during session number 01896, MELTON used **TARGET TELEPHONE 5** to call telephone number 803-413-6799, a number believed to be used by Punkin Chapman. During the call, MELTON stated, “Man come on, I just told you these people to um, leave from Mo Bays man. I told you my play done leave from Mo Bays in ten minutes.” (Affiant believes that MELTON was informing Chapman that he had to get to **LEGACY CARIBBEAN BAR AND GRILL** to make a drug sale with some unknown buyers and they were leaving in ten minutes. MELTON informed Chapman that his buyers were currently at **LEGACY CARIBBEAN BAR AND GRILL** and MELTON needed to get to them soon in order to make the scheduled drug sale.)

40. On November 30, 2019 at approximately 8:29 p.m., during session number 00149, **TARGET TELEPHONE 4**, ESCOBAR called 803-206-5075, a phone number used by an unknown Hispanic male (UHM) believed to be one of ESCOBAR’S cocaine suppliers. During the call, ESCOBAR said, “Was that something somebody else turned in?” UHM responded, “Oh, no, no, no.” ESCOBAR said, “Because you said you ain't have no more, nigga.” UHM said, “No. I have no more because I was going get it. Because there was one whole that was for somebody and they didn't get it. So someone took a piece and someone took a piece and...” ESCOBAR then said, “I was making sure it ain't shit nobody turned back. But if it was like that, you should have just gave me my whole half back motherfucker.” UHM responded, “I know, but shit. You asked for it, I gave it to you. I didn't deny it.” ESCOBAR says, “Stop being greedy. Next time I come for that shit give me my half back.” UHM said, “Alright.” ESCOBAR then said, “Alright, I'm going to move the shit now.” (Affiant believes during this call, ESCOBAR was unhappy about the quality of a kilogram of cocaine ESCOBAR had received from the UHM. ESCOBAR then informed UHM that he was going to “move” or sell the cocaine that he currently had.) Location

data of **TARGET TELEPHONE 4** on November 30, 2019 at 8:43 p.m.<sup>20</sup> indicated ESCOBAR was in the vicinity of **LEGACY CARIBBEAN BAR AND GRILL**.

41. On December 4, 2019, Agents conducted surveillance of ESCOBAR following information received over court-authorized wire intercepts of **TARGET TELEPHONE 2**.

42. On December 4, 2019, Agents intercepted calls which indicated that ESCOBAR was going to acquire a kilogram of cocaine from his source of supply, and then would supply LEACH with 18 ounces of cocaine. At approximately 2:58 p.m., during session number 04694 on **TARGET TELEPHONE 2**, LEACH informed ESCOBAR that he (LEACH) was “dead”. During the same phone call, ESCOBAR informed LEACH that he was going to pick up his daughter and then “go up there and get it.” (Based on this call and other information gathered during this investigation, Affiant believes LEACH being “dead” meant that he (LEACH) was out of drugs. Additionally, when ESCOBAR stated he was going to “go up there and get it,” ESCOBAR meant that he (ESCOBAR) was going to meet his source of supply to receive more cocaine.)

43. At approximately 4:39 p.m., Agents observed a two-door silver Volkswagen hatchback arrive at **ESCOBAR’S RESIDENCE**. A heavy-set, dark skinned female exited the silver Volkswagen, matching the description of Tenese Gunter. At about the same time, a champagne colored Chevy Malibu arrived at **ESCOBAR’S RESIDENCE**. A black male, later identified as ESCOBAR, wearing a red shirt, and a female child exited the Malibu. The individuals carried several grocery bags into the house at **ESCOBAR’S RESIDENCE**.

44. At approximately 5:05 p.m., Agents observed ESCOBAR, wearing a black hooded sweatshirt, exit **ESCOBAR’S RESIDENCE**. After exiting the residence, ESCOBAR

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<sup>20</sup> According to the provider, the location of ESCOBAR’S phone had a certainty factor of 1,057 m at 8:43 p.m. However, at approximately 10:02 p.m. on the same date, ESCOBAR’s phone was also located at **LEGACY CARIBBEAN BAR AND GRILL** with a certainty factor of 57m.

entered the silver Volkswagen. Soon thereafter Agents observed ESCOBAR depart **ESCOBAR'S RESIDENCE** in the silver Volkswagen.

45. At approximately 5:46 p.m., Agents observed ESCOBAR drive to **LEGACY CARIBBEAN BAR AND GRILL**. Agents observed ESCOBAR smoke a cigarette and then enter the restaurant at that location.

46. At approximately 6:24 p.m., during session number 04717, on **TARGET TELEPHONE 2**, LEACH made a call to ESCOBAR. During the call, ESCOBAR informed LEACH that he was "at work." Agents continued to observe ESCOBAR's vehicle at **LEGACY CARIBBEAN BAR AND GRILL** until approximately 7:05 p.m., at which time surveillance was terminated.

47. On March 13, 2020, Agents observed ESCOBAR's champagne in color Chevy Malibu parked at **LEGACY CARIBBEAN BAR AND GRILL** at approximately 10:30 p.m. On May 28, 2020, Agents again observed ESCOBAR's Chevy Malibu parked at **LEGACY CARIBBEAN BAR AND GRILL** at approximately 9:38 p.m. Additionally, on June 3, 2020, Agents observed a black Dodge Charger with pink trim and a South Carolina license plate of "PQZ144". According to SC DMV, this vehicle is registered to Keisha Nabre Pratt. According to Source 3, Pratt is the girlfriend of Christopher TAYLOR who was observed conducting a cocaine transaction with LEACH on April 7, 2020 (see paragraphs 62 and 63 below). According to Source 3, Pratt transports narcotics on TAYLOR's behalf in her Dodge Charger.

48. According to pen register and toll data collected by the FBI, ESCOBAR continued to stay in telephonic contact with other members of the drug trafficking organization following the termination of the Title III wiretaps on December 20, 2019. As recently as April 8, 2020,

ESCOBAR was in telephonic contact with Trinette MELTON<sup>21</sup>. ESCOBAR was also in telephonic contact with a phone number used by LEACH as recently as June 10, 2020. Additionally, ESCOBAR was also in telephonic contact with Michelle EDWARDS as recently as June 11, 2020.

49. Based on intelligence received through calls and other information gathered during this investigation, Affiant believes ESCOBAR is the kitchen manager at **LEGACY CARIBBEAN BAR AND GRILL** where he has an office and a desk that he utilizes on a daily basis. Information gathered in this investigation indicates that ESCOBAR's office (kitchen manager's office) at **LEGACY CARIBBEAN BAR AND GRILL** contains documents pertaining to the drug trafficking activities of ESCOBAR, LEACH, MELTON and other co-conspirators. I also believe that ESCOBAR and the members of the Rolling 60 Crips use **LEGACY CARIBBEAN BAR AND GRILL** as a safe haven to coordinate numerous illegal activities, specifically their drug trafficking operation. I also believe that there are documents such as drug ledgers, currency, telephone bills and other information in the kitchen manager office at **LEGACY CARIBBEAN BAR AND GRILL** corroborating intelligence intercepted over the court-authorized wiretaps of **TARGET TELEPHONE 2, TARGET TELEPHONE 4 and TARGET TELEPHONE 5**.

#### **LEACH'S RESIDENCE**

(200 Wildwood Lane, Lugoff, South Carolina, 29078)

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<sup>21</sup> During the Title III investigation of this drug trafficking organization, Trinette MELTON was intercepted on numerous occasions discussing narcotics and drug proceeds with LEACH and Christopher MELTON. Wire interceptions and surveillance indicated that Trinette was responsible for holding assets in her name for this drug trafficking organization. Additionally, on December 18, 2019, Trinette was intercepted on a phone call during which she informed C. MELTON that ESCOBAR had two kilograms of cocaine available.

50. On October 28, 2019, Agents conducted surveillance of LEACH in conjunction with a phone call that occurred on that date between LEACH and Ashley Bryon FISHER (session 00662 on **TARGET TELEPHONE 2**). During that phone call, LEACH stated, “Just text me what route you want to go.” FISHER stated, “We going Deon Sanders number.” LEACH then stated, “Alright say no more.” (Affiant believes that FISHER was ordering 21 grams of cocaine or crack cocaine from LEACH during this call). After intercepting the call, at approximately 2:30 p.m., Agents established surveillance on LEACH at **LEACH’S RESIDENCE**. SA Jeffery Ebert observed a gold Chevy Tahoe parked in the back yard of the residence. As previously mentioned, Agents observed LEACH driving this vehicle on numerous occasions throughout their investigation.

51. At approximately 2:39 p.m., SA Ebert observed a white Kia arrive at **LEACH’S RESIDENCE**. SA Ebert observed a black female and child exit the vehicle and enter the residence. While surveillance units were present at the residence, another phone call was intercepted on **TARGET TELEPHONE 2**. LEACH received an incoming telephone call at approximately 2:43 p.m. from telephone number 704-885-6092, a telephone number known to be used by Willie SIMMONS. During the phone call, the voice of a young child was heard in the background, as well as the voice of a female. Agents believe that the voices they heard in the background of the call were the female and child seen by Agent Ebert at **LEACH’S RESIDENCE**.

52. At approximately 3:35 p.m., SA Ebert observed LEACH walk out of the house wearing a white shirt and black shorts. LEACH was talking on a telephone and was smoking a cigarette. Simultaneously, at approximately 3:35 p.m., a phone call was intercepted on **TARGET TELEPHONE 2** (session #00710). LEACH placed an outgoing phone call to telephone number 803-722-8832. During the phone conversation, LEACH is heard smoking a cigarette while

speaking to an individual on the phone. During the phone conversation, at approximately 3:57 p.m., SA Ebert observed LEACH walk back into the residence while still speaking on a telephone. While surveillance units observed LEACH walk back into the residence, there was still a phone conversation being intercepted over **TARGET TELEPHONE 2**.

53. At approximately 4:25 p.m., SA Ebert observed LEACH exit **LEACH'S RESIDENCE** and enter the Chevy Tahoe. Soon thereafter, SA Ebert observed LEACH depart **LEACH'S RESIDENCE**.

54. At approximately 4:49 p.m., SA Ebert observed the gold Chevy Tahoe arrive in the Briarcliffe neighborhood. Surveillance was maintained on the Chevy Tahoe from **LEACH'S RESIDENCE** to the Briarcliffe neighborhood. The Tahoe conducted a "heat run"<sup>22</sup> around the Briarcliffe neighborhood, before arriving at 205 Camp Creek Drive, in Elgin. At approximately 4:52 p.m., SA Ebert observed the Tahoe back into the driveway at 205 Camp Creek Drive. SA Ebert then observed LEACH enter the residence.

55. On October 28, 2019, at approximately 3:20 a.m., LEACH used **TARGET TELEPHONE 2** during session 00614 to make an outgoing call to Brittney Woolford, who used telephone number 704-901-6923. During the call, LEACH can be heard counting large sums of money out loud to Woolford. At one point during the call, LEACH stated, "That brings the total to 28-2, and then, (unintelligible audio) six, nine, oh yeah that's straight, I could live with that. I could eat like that B. Now I'm fixing to go in and wash my hands and fix me something to eat. All in a day's work. Whoever say crime don't pay must have been working under the Trump Plan." The call ended at approximately 4:54 a.m. Location data of **TARGET TELEPHONE 2** at

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<sup>22</sup> A "heat run" is a counter-surveillance technique often used by drug traffickers to identify law enforcement or rival drug traffickers who may be attempting to follow them.

approximately 5:31 a.m.<sup>23</sup> indicated that LEACH was at **LEACH'S RESIDENCE**. (Affiant believes that LEACH had gathered \$28,200 of drug proceeds from drug sales in Columbia and transported the money back to **LEACH'S RESIDENCE** for safe keeping.)

56. On November 14, 2019, at approximately 7:18 a.m., LEACH used **TARGET TELEPHONE 2** to receive a call from SIMON, who used **TARGET TELEPHONE 3**. During the call, LEACH asked, "It ain't gonna be no month ain't it?" SIMON responded, "No it shouldn't be, cuz once he get a call, yeah he gonna call, no it's just. Them people been waiting and there been other shit going on." LEACH stated, "Yeah I figured. Shit. Like I say, my hood people, you know, gonna handle my stuff. They, they kinda taxing, but I mean shit, I'm kinda like, I'm like, let me see, cuz shit, that's about ten. I got, uh shit uh, nine and a half type shit." SIMON responded, "Yeah, I mean shit, we'll work like I said." (Affiant believes that LEACH was counting drug proceeds at **LEACH'S RESIDENCE** and informed SIMON that he (LEACH) had \$9,500 or \$10,000 available to purchase cocaine from SIMON.) Location data of **TARGET TELEPHONE 2** at approximately 7:06 a.m.<sup>24</sup> indicated that LEACH was at **LEACH'S RESIDENCE**. Additionally, location data of **TARGET TELEPHONE 2** at approximately 7:53 a.m.<sup>25</sup> indicated that LEACH was at **LEACH'S RESIDENCE**.

57. On November 16, 2019, at approximately 10:47 p.m.,<sup>26</sup> location data received from **TARGET TELEPHONE 2** indicated LEACH was in the vicinity of **LEACH'S RESIDENCE**.

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<sup>23</sup> According to the provider, the location of ESCOBAR'S phone had a certainty factor of 24 m at 5:31 a.m.

<sup>24</sup> According to the provider, the location of LEACH'S phone had a certainty factor of 27 m at 7:06 a.m.

<sup>25</sup> According to the provider, the location of LEACH'S phone had a certainty factor of 24 m at 7:53 a.m.

<sup>26</sup> According to the provider, the location of LEACH'S phone had a certainty factor of 13 m at 10:47 p.m.

On November 16, at approximately 11:38 p.m., LEACH used **TARGET TELEPHONE 2** to make an outgoing call to 803-669-6972, a number believed to be used by an unknown female relative of LEACH (hereinafter referred to as UF6972). During the call, LEACH stated, “I’m about to run Hurt right here to the gas station, um, keep Reese out of the living room until we get back.” UF6972 responded, “Ok, alright.” At approximately 11:37 p.m.,<sup>27</sup> location data received from **TARGET TELEPHONE 2** indicated LEACH was in the vicinity of **LEACH’S RESIDENCE**. (Affiant believes that LEACH called UF6972 to ask her to keep his young son “Reese” out of the living room because LEACH and SIMMONS<sup>28</sup> were keeping drug trafficking materials in that room. LEACH also informed UF6972 that he was taking SIMMONS to the gas station where Affiant believes they had scheduled a drug transaction. LEACH informed UF6972 that they would be returning to **LEACH’S RESIDENCE** afterward.)

58. On November 28, 2019, at approximately 7:28 p.m., LEACH used **TARGET TELEPHONE 2** during session 04032 to make an outgoing call to “Quita”. During the call, Quita said, “Send me the address.” LEACH responded, “It’s 200 Wildwood Lane.” Quita replied, “Uh-uh, I said send it to me, I’m not...” LEACH interrupted and said, “I don’t like texting that shit and leaving it in phones and shit, it’s 200 Wildwood Lane.” Quita responded, “Wildwood, your mama house? Or your grandma house?” LEACH answered, “My grandma’s house.”<sup>29</sup> (Affiant believes

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<sup>27</sup> According to the provider, the location of LEACH’S phone had a certainty factor of 537 m at 11:37 p.m.

<sup>28</sup> According to open source credit reports, **LEACH’S RESIDENCE** was also the listed residence for SIMMONS, the leader of the Rolling 60s Crips, as recently as April of 2018. However, wire intercepts from November of 2019 indicated that SIMMONS, at a minimum, visited LEACH regularly at **LEACH’S RESIDENCE** while they were conducting drug trafficking activities together.

<sup>29</sup> According to SC DMV, **LEACH’S RESIDENCE** is also the listed residence of Roslyn Simmons. Roslyn Simmons is believed to be the grandmother of both LEACH and SIMMONS and LEACH lives at this location with his grandmother.



that LEACH gave Quita the address of **LEACH'S RESIDENCE**, but refused to text this address to Quita because LEACH wanted to safeguard the location of his residence from law enforcement and competitors since he keeps drugs and the proceeds thereof at this residence.)

59. On February 3, 2020, Agents conducted surveillance of **LEACH'S RESIDENCE**. TFO Henry Owens observed LEACH standing in the driveway of **LEACH'S RESIDENCE** speaking on a cell phone. TFO Owens observed a white Cadillac sedan in the driveway of **LEACH'S RESIDENCE**. As TFO drove past **LEACH'S RESIDENCE**, LEACH made visual contact with TFO Owens' unmarked vehicle as if LEACH recognized TFO Owens' vehicle. TFO Owens drove approximately a mile down Wildwood Lane and turned into a nearby neighborhood. Soon thereafter, TFO Owens arrived at the four-way stop at Richardson Boulevard and Wildwood Lane. While stopped, TFO Owens observed the same white Cadillac behind TFO Owens' vehicle. TFO Owens passed by **LEACH'S RESIDENCE** and confirmed that the white Cadillac was no longer in the driveway but rather appeared to be following TFO Owens.

60. Upon arriving at Magnolia Lane, TFO Owens turned right towards Highway 1. The white Cadillac continued to follow TFO Owens. TFO Owens continued driving approximately three miles. TFO Owens then turned right onto Whitehead Road. TFO Owens observed the white Cadillac turn into the gas station at Whitehead Road and Highway 1. TFO Owens turned around on Whitehead Road and went back to the gas station at Whitehead Road. Within approximately 45 seconds the white Cadillac departed the gas station. Soon thereafter, TFO Owens went back past **LEACH'S RESIDENCE** and saw that the Cadillac was back in the driveway. Agents believe LEACH was driving the white Cadillac and was conducting counter-surveillance on TFO Owens at **LEACH'S RESIDENCE**.

61. On the morning of March 5, 2020, TFO Owens again conducted surveillance at **LEACH'S RESIDENCE**. The same white Cadillac that conducted counter-surveillance on TFO Owens on February 3, 2020 was located in the driveway of the **LEACH'S RESIDENCE**.

62. On April 7, 2020, Agents were again conducting surveillance at **LEACH'S RESIDENCE**. At approximately 4:46 p.m., Agents observed LEACH exit **LEACH'S RESIDENCE** with an object in his hand. LEACH entered a white Cadillac XTS with SC license tag SKN466<sup>30</sup> (believed to be the same vehicle from paragraphs 59, 60 and 61) with the object and departed the location. Agents followed LEACH, who drove the white Cadillac to 205 Camp Creek Road, Elgin, SC. At approximately 5:06 p.m., Agents observed LEACH exit the vehicle and enter the residence at that location. At approximately 5:12 p.m., Agents observed a white Nissan Titan with SC license tag NTS916<sup>31</sup> pull into the driveway at 205 Camp Creek Road. At approximately 5:14 p.m., Agents observed LEACH exit 205 Camp Creek Road and retrieve a blue bag from the white Cadillac. LEACH then handed the blue bag to the driver of the white Nissan Titan, who then handed an object to LEACH in return. At approximately 5:15 p.m., the Nissan Titan departed the location and LEACH returned to **LEACH'S RESIDENCE**.

63. Agents subsequently coordinated a traffic stop with RCSD on the white Nissan Titan after the observed transaction with LEACH. During the stop, RCSD deputies observed a handgun in the vehicle. A search of the vehicle then resulted in deputies seizing a blue bag containing approximately \$7,000 of U.S. currency in addition to the handgun. Deputies identified

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<sup>30</sup> According to SC DMV, SKN466 is registered to a 2013 Cadillac XTS owned by Willie Edward SIMMONS, Jr. at 200 Wildwood Lane, Lugoff, SC (**LEACH'S RESIDENCE**).

<sup>31</sup> According to SC DMV, NTS916 is registered to Christopher TAYLOR at 406 Saddletail Road, Columbia, SC.

the driver of the vehicle as Christopher TAYLOR, who was arrested and charged with unlawful carrying of a firearm.

64. Immediately following this event, RCSD narcotics investigators conducted a search warrant on 205 Camp Creek Road on the evening of April 7, 2020. During the search, investigators discovered approximately five ounces of cocaine, wrappers that appeared to be used for packaging cocaine, and numerous documents related to LEACH and other co-conspirators of this investigation. Specifically, there were bills, receipts court records, and other miscellaneous documents that appeared to belong to Nelson ESCOBAR, Christopher MELTON, and Trinette MELTON. LEACH was subsequently arrested and charged with trafficking cocaine. During a post-*Miranda* interview immediately following these events, LEACH confirmed that he had just bought cocaine from Taylor. Additionally, LEACH identified both BRITT and ESCOBAR as drug dealers in the Columbia area. (Affiant believes that LEACH had brought the blue bag, which contained money, from **LEACH'S RESIDENCE** to 205 Camp Creek Road. At 205 Camp Creek Road, LEACH then gave the blue bag of money to TAYLOR in exchange for the five ounces of cocaine that was later seized by RCSD.)

65. On April 29, 2020, at approximately 8:40 a.m., an Agent observed LEACH'S white Cadillac parked in the backyard of **LEACH'S RESIDENCE**. The Agent also observed LEACH walking in the driveway of **LEACH'S RESIDENCE** while talking on a cellular phone. Then on June 3, 2020 and again on June 4, 2020, Agents again observed LEACH's white Cadillac parked in the backyard behind **LEACH'S RESIDENCE**.

66. According to pen register and toll data collected by the FBI, LEACH continued to stay in telephonic contact with other members of the drug trafficking organization following the termination of the Title III wiretaps on December 20, 2019. LEACH was in telephonic contact

with SIMON as recently as April 29, 2020. Additionally, as recently as May 18, 2020, BALLARD telephonically contacted LEACH's **TARGET TELEPHONE 2**. LEACH was also in telephonic contact with both ESCOBAR and Trinette MELTON as recently as June 10, 2020.

67. Based on calls and other information gathered from this investigation, Affiant believes that LEACH coordinates drug transactions and gang affiliated activities from **LEACH'S RESIDENCE**. Affiant believes there are documents such as drug ledgers, currency, telephone bills and other information corroborating intelligence intercepted over the court-authorized interception of **TARGET TELEPHONE 2**.

#### **ESCOBAR'S RESIDENCE**

(49 Dovecreek, Columbia, South Carolina, 29229)

68. On November 29, 2019, at approximately 12:19 p.m., ESCOBAR used **TARGET TELEPHONE 4** during session 00119 to receive a call from an unknown Hispanic source of supply who used telephone number 803-206-5075 (hereinafter referred to as HS5075). During the call, ESCOBAR stated, "So we ain't gonna have shit for the first right?" HS5075 responded, "Oh yeah, I'm just waiting on you, basically." ESCOBAR asked, "Well, you coming here cuz I got to leave?" HS5075 answered, "Um, go ahead and just leave that shit, I'm gonna take care of something real quick before it gets too late." ESCOBAR stated, "Alright". According to location data from **TARGET PHONE 4**, ESCOBAR was at 49 Dovecreek (**ESCOBAR'S RESIDENCE**) at approximately 12:24 p.m.<sup>32</sup> on November 29, 2019. (Affiant believes that ESCOBAR informed HS5074 that he wanted more cocaine before the first of the month and that he was currently at his **ESCOBAR'S RESIDENCE** where he was ready to receive the cocaine. HS5074 stated that he

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<sup>32</sup> According to the provider, the location of ESCOBAR'S phone had a certainty factor of 19 m at 12:24 p.m.

was ready to give HS5074 the cocaine but he had to run another errand first. ESCOBAR and HS5074 then agreed for ESCOBAR to leave the payment for HS5074's cocaine at **ESCOBAR'S RESIDENCE**.)

69. On December 3, 2019, at approximately 7:50 p.m., LEACH used **TARGET TELEPHONE 2** during session 04596 to make an outgoing call to ESCOBAR, who used telephone number 803-553-3973. During the call, LEACH said, "That other boy called me and said he needed a what-ya-call-it." ESCOBAR responded, "I got four and a half at the crib and other shit nephew got bro." LEACH stated, "Alright." (Affiant believes that ESCOBAR informed LEACH that he had four and half ounces of cocaine available for sale that he (ESCOBAR) was keeping at his house (**ESCOBAR'S RESIDENCE**) along with other narcotics he had received from "nephew".)

70. On December 4, 2019, at approximately 2:58 p.m., during session number 04694, on **TARGET TELEPHONE 2**, LEACH informed ESCOBAR that he (LEACH) was "dead." During the same call, in session 04694, ESCOBAR informed LEACH that he was going to pick up his daughter and then "go up there and get it." (Based on this call and other information gathered during this investigation, Affiant believes LEACH being "dead," meant that he (LEACH) was out of drugs, and ESCOBAR stating he was going to "go up there and get it," meant he (ESCOBAR) was going to meet his source of supply for a resupply of cocaine.)

71. At approximately 5:05 p.m., surveillance Agents observed ESCOBAR, wearing a black hooded sweatshirt, exit **ESCOBAR'S RESIDENCE**. After exiting the residence, ESCOBAR entered a silver Volkswagen and depart **ESCOBAR'S RESIDENCE**.

72. Agents maintained surveillance on ESCOBAR until ESCOBAR arrived at **LEGACY CARIBBEAN BAR AND GRILL**, at approximately 5:46 p.m. Agents observed ESCOBAR smoke a cigarette and then enter the restaurant at that location.

73. At approximately 6:24 p.m., during session number 04717, on **TARGET TELEPHONE 2**, LEACH made an outgoing call to ESCOBAR. During the call ESCOBAR said, “I ain’t bring the car.”<sup>33</sup> LEACH says, “That’s what I was calling ask you to do, instead of coming way down there.” ESCOBAR says, “The car at the house. I will tell her to leave the key. Take a small one. There’s two nines and a half.” LEACH said, “Okay so take a nina? Or really Don boy say he done 2 but he say he got a play to make for a nina. So what you want me to do?” ESCOBAR said, “Well take two then bro that’s on you. Take the two singles. Don’t take the whole one...” LEACH says, “Okay, so just take the two single ones? They ninas?” ESCOBAR said, “Yeah the two singles is nine, the other one is half.”

74. Based on this surveillance, the call referenced in session 04717, and other information gathered during this investigation, Affiant believes ESCOBAR met with his source of supply earlier on December 4, 2019 and stored those drugs at his residence. When ESCOBAR said, “the car at the house,” Affiant believes that ESCOBAR was telling LEACH that he had a kilogram of cocaine (“car”) at **ESCOBAR’S RESIDENCE**. Affiant believes “two nines and a half,” indicates that the kilogram was broken up into smaller quantities of cocaine, two nine-ounce quantities and a half-kilogram quantity, equaling a total of a kilogram.

75. As a result of these calls, Agents established surveillance of LEACH on December 5, 2019. At approximately 3:21 p.m., on December 5, 2019, during session 04772, on **TARGET**

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<sup>33</sup> Affiant believes, based upon Title III interceptions in this investigation, that this organization uses the word “car” to refer to a kilogram of cocaine.

**TELEPHONE 2**, LEACH informed ESCOBAR that he was going to “pull up on Auntie.” LEACH inquired if “Auntie” was at work and ESCOBAR confirmed that “Auntie” was at work. Based on this and previous calls, Affiant believes that ESCOBAR told LEACH to go to Gunter’s, a/k/a “Auntie’s” (ESCOBAR’s wife) place of business to pick up the cocaine.

76. At approximately 3:33 p.m., on December 5, 2019, Agents observed LEACH’S Chevy Tahoe at Providence Family Medicine, 105 Professional Park Road, Columbia, SC. Agents observed LEACH enter the driver’s side compartments of a Chevy Malibu, in the parking lot of Providence Family Medicine. LEACH exited the Chevy Malibu and Agents observed a bulge in LEACH’S pockets. Soon thereafter, Agents observed LEACH return to his Chevy Tahoe and depart the Providence Family Medicine parking lot.

77. At approximately 3:35 p.m., during session 04775, on **TARGET TELEPHONE 2**, LEACH informed ESCOBAR that he would “take the two little ones” and that he “left the big one in there.” ESCOBAR confirmed that this is what he wanted LEACH to do.

78. On February 25, 2020, TFO Owens conducted surveillance on **ESCOBAR’S RESIDENCE**. At that residence, TFO Owens observed the 2011 Chevy Malibu, previously used by ESCOBAR and LEACH for a kilogram transaction, parked in the driveway of the residence (see paragraph 76). Soon thereafter, TFO Owens observed ESCOBAR driving the same Chevy Malibu in vicinity of Summit Parkway, in Columbia, South Carolina. TFO Owens followed ESCOBAR to North Springs Elementary School. ESCOBAR has been observed going to North Springs Elementary School regularly during prior surveillance operations. On March 9, 2020, Agents again observed ESCOBAR’s 2011 Chevy Malibu parked in the driveway of **ESCOBAR’S RESIDENCE**.

79. On April 28, 2020, at approximately 11:00 a.m., and again on April 29, 2020, at 10:40 a.m., Agents observed ESCOBAR'S champagne in color Chevy Malibu, in the driveway of **ESCOBAR'S RESIDENCE**. Likewise, on May 27, 2020 at approximately 9:27 a.m., Agents again observed ESCOBAR's Chevy Malibu parked in the driveway at **ESCOBAR'S RESIDENCE**.

80. According to pen register and toll data collected by the FBI, ESCOBAR continued to stay in telephonic contact with other members of the drug trafficking organization following the termination of the Title III wiretaps on December 20, 2019. For a review of ESCOBAR's recent telephonic activity see paragraph 48.

81. Based on intercepted calls and other information gathered during this investigation, Affiant believes that **ESCOBAR'S RESIDENCE** is the residence and primary stash location for ESCOBAR. Affiant also believes that ESCOBAR has documents such as drug ledgers, currency, telephone bills and other information corroborating intelligence intercepted over the court authorized interception of **TARGET TELEPHONE 2**, **TARGET TELEPHONE 4** and **TARGET TELEPHONE 5**, located inside **ESCOBAR'S RESIDENCE**.

#### **SIMON'S RESIDENCE**

(101 Stoneybridge Road, Columbia, South Carolina, 29223)

82. On December 3, 2019, Agents conducted surveillance of Devonte SIMON and Christopher MELTON, following information received via the court authorized wire intercept of **TARGET TELEPHONE 3**. Information was received on **TARGET TELEPHONE 3**, during session number 00898 which indicated that SIMON was going to supply MELTON with approximately nine ounces of cocaine. At approximately 10:05 a.m., during the interception of



**TARGET TELEPHONE 3**, SIMON informed MELTON that SIMON only had “one 9” left and notified MELTON, “I got you.” (Based on this call and other information gathered during this investigation, Affiant believes that when SIMON said “one 9,” he was letting MELTON know that he had 9 ounces of cocaine remaining out of SIMON’S current supply. Affiant also believes that when SIMON told MELTON, “I got you,” SIMON confirmed that the last 9 ounces of cocaine was reserved for MELTON.)

83. On December 3, 2019, at approximately 5:36 p.m., MELTON contacted SIMON on **TARGET TELEPHONE 3** to coordinate a cocaine transaction.

84. At approximately 5:45 p.m., Agents observed SIMON driving a grey Chevy Colorado bearing SC license plate NPM261<sup>34</sup> on Woodberry Road, West Columbia, South Carolina. Agents conducted surveillance of SIMON's vehicle from Woodberry Road to **SIMON’S RESIDENCE**. Agents observed SIMON enter **SIMON’S RESIDENCE** for a brief period of time. SIMON returned to his vehicle at approximately 6:34 p.m. Soon thereafter, Agents observed SIMON exit his vehicle and walk to a white shed located near **SIMON’S RESIDENCE**. At approximately 6:42 p.m., Agents observed SIMON enter his grey Chevy Colorado and depart **SIMON’S RESIDENCE**.

85. At approximately 6:54 p.m., during session 01009, on **TARGET TELEPHONE 3**, MELTON contacted SIMON and coordinated a meeting at the “Cheap Way.” During the telephone call, SIMON told MELTON he was giving him “some more.” (Based on this call and other information gathered during this investigation, Affiant believes the meeting location was changed to the Cheap Way gas station, and when SIMON informed MELTON he was giving

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<sup>34</sup> According to the SC DMV, SC license plate NPM261 is registered to a 2006 Chevy Colorado, owned by Devonte Jabar SIMON, at 3951 Webb Court, Columbia, South Carolina, 29204.

MELTON “some more,” Affiant believes SIMON was telling MELTON he had more cocaine to give MELTON.)

86. At approximately 6:56 p.m., Agents maintained surveillance of SIMON in his Chevy Colorado from Standish Street to the Cheap Way Gas Station, 5400 Farrow Road, Columbia, SC. While at the Cheap Way, Agents observed SIMON briefly meet with MELTON. Following the meeting between SIMON and MELTON, SIMON's vehicle and MELTON's vehicle departed the Cheap Way in separate directions.

87. At approximately 7:00 p.m., during session 02691, on **TARGET TELEPHONE 5**, MELTON informed a female named Stephanie that he (MELTON), “just got the candy,” and that MELTON was going to “go get everything together now.” (Based on this call and other information gathered during this investigation, Affiant believes “just got the candy,” meant MELTON had just received the cocaine from SIMON, which SIMON had brought directly from **SIMON’S RESIDENCE**. Additionally, when MELTON stated “go get everything together now,” he was informing the female that he (MELTON) was going to prepare the cocaine for distribution.)

88. On December 14, 2019, at approximately 9:07 a.m., SIMON utilized **TARGET TELEPHONE 3**, during session number 02217, to receive an incoming telephone call from telephone number 803-888-9392, utilized by an Unknown Male (herein referred to as UM9392). During the telephone call SIMON said, “What you need?” UM9392 said, “I don’t need but three bro, I need three cause Main about to give up, that's two, and I got a one, I got a one play.” SIMON responded, “Alright I'm a have to get it, I got, I got two half and a quarter at the house over there.” (Based on this call and other information gathered during this investigation, Affiant believes SIMON coordinated a drug transaction for approximately 3 ounces of cocaine for UM9392. Affiant also believes that when SIMON said, “Alright I'm a have to get it, I got, I got two half and

a quarter at the house over there,” he was saying that he (SIMON) had approximately three ounces of cocaine at **SIMON’S RESIDENCE** which he would pick up and provide to UM9392.)

89. On December 18, 2019, Agents conducted surveillance of SIMON related to intercepted location data over the court authorized interception of **TARGET TELEPHONE 3**.

90. On December 18, 2019, at approximately 3:30 p.m., Agents established surveillance on **SIMON’S RESIDENCE**. RCSD Investigator Drayton Raven observed a red Ford Focus in the driveway of **SIMON’S RESIDENCE**.

91. At approximately 4:00 p.m., location data indicated that **TARGET TELEPHONE 3** (SIMON’s phone) was in the vicinity of Decker Boulevard and Omega Drive, Columbia, SC. Agents knew that Lucius Allen, one of SIMON's cocaine associates, lived in that area, and set up surveillance in that area.

92. At approximately 4:03 p.m., RCSD Investigator John Lutz observed the same red Ford Focus, earlier observed at **SIMON’S RESIDENCE**, departing the driveway of 1111 Percival Road. Investigator Brunson observed the red Ford Focus bearing SC license plate RTG879.<sup>35</sup>

93. At approximately 4:16 p.m., Investigator Lutz observed SIMON in the red Ford Focus on Rabon Road heading toward Stoneybridge Road. At approximately 4:20 p.m., Investigator Raven observed the Ford Focus at **SIMON’S RESIDENCE**. (Based on this surveillance, and other information gathered during this investigation, Affiant believes SIMON departed **SIMON’S RESIDENCE** and drove to Allen’s residence to either sell drugs to or collect proceeds thereof from Allen.)

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<sup>35</sup> According to the SC DMV, SC license plate RTG879 is registered to a 2008 Ford Focus belonging to Jasmine Chantal Moore, at 5225 Clemson Avenue, Apartment 105, Columbia, South Carolina, 29206-3045. Agents have not yet identified any further connections between SIMON and Moore.

94. On March 5, 2020, TFO Owens conducted surveillance at **SIMON'S RESIDENCE**. TFO Owens observed the same red Ford Focus in which Agents had observed SIMON driving (see previous paragraph) parked in the driveway of **SIMON'S RESIDENCE**.

95. On April 15, 2020, FBI Special Agent Joshua Loomis observed a black 2016 Chevy Silverado<sup>36</sup> parked at **SIMON'S RESIDENCE**. Agents had previously identified this as SIMON's vehicle and had observed him make drug transactions utilizing this vehicle during previous surveillance operations. On April 29, 2020, at approximately 7:30 a.m., Agents again observed SIMON'S black Chevy Silverado backed into the driveway of **SIMON'S RESIDENCE**.

96. On May 27, 2020 at approximately 1:00 p.m., Agents again observed SIMON's black Chevy Silverado at this location as it was backing out of the driveway of **SIMON'S RESIDENCE**.

97. According to pen register data collected by the FBI, SIMON continued to stay in telephonic contact with other members of the drug trafficking organization, specifically Christopher MELTON, following the termination of the Title III wiretaps on December 20, 2019. As recently as April 10, 2020, SIMON was in telephonic contact with MELTON. Additionally, SIMON was in telephonic contact with a telephone number used by LEACH as recently as April 29, 2020. SIMON also stayed in telephonic contact with Laniqua Oliver as recently as May 1, 2020. During the wiretap investigation, on December 2, 2019, SIMON was intercepted asking Oliver to transport and store \$25,000 for him in order to safeguard the money from law enforcement.

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<sup>36</sup> According to the SC DMV, a 2016 Chevy Silverado with SC license plate WQ0362B is registered to SIMON at 101 Stoneybridge Road, Columbia, South Carolina, 29223 (**SIMON'S RESIDENCE**).

98. Affiant believes based on intercepted calls and information received from this investigation and on training and experience that **SIMON'S RESIDENCE** is the primary stash location for SIMON'S drug trafficking activities. Based on calls and other information gathered from this investigation, I also believe that SIMON has documents such as drug ledgers, currency, telephone bills and other information corroborating intelligence intercepted over the court-authorized interception of **TARGET TELEPHONE 3**, **TARGET TELEPHONE 2** and **TARGET TELEPHONE 5** located at **SIMON'S RESIDENCE**.

#### **LLOYD'S RESIDENCE**

(4 Pinecroft Court, Columbia, South Carolina, 29229)

99. On October 31, 2019, at approximately 2:34 p.m., during session number 00046 (pen data received during session 00045), BRITT utilized **TARGET TELEPHONE 1** to place a call to Tommy Novack LLOYD to coordinate a drug transaction. During the call, BRITT said, "Where you at?" LLOYD said, "I'm ready." BRITT asked, "Which way you (unintelligible audio) talking about?" LLOYD said, "Eighteen." (Affiant believes that BRITT utilized **TARGET TELEPHONE 1** to coordinate a drug transaction for approximately 18 ounces of cocaine at **LLOYD'S RESIDENCE**.)

100. On November 18, 2019, as a result of intercepted calls, Agents established surveillance on BRITT. At approximately 1:51 p.m., during session number 00225, Agents intercepted a call indicating that BRITT was prepared to supply LLOYD with approximately 18 ounces of cocaine. During the phone call LLOYD said, "Yo." BRITT said, "What's going on Unk, you at the house?" LLOYD said, "Yeah I'm here." BRITT said, "Alright I'm gonna be around there in a minute." LLOYD replied, "Alright." (Affiant believes that BRITT utilized **TARGET TELEPHONE 1** to coordinate a drug transaction at **LLOYD'S RESIDENCE**).

101. At approximately 1:54 p.m., surveillance units observed BRITT departing his neighborhood, driving a burgundy Porsche bearing SC license plate QSY844. The burgundy Porsche BRITT was observed operating is a known vehicle utilized by BRITT and has been observed on multiple surveillance operations.

102. At approximately 2:03 p.m., Investigator Lutz observed BRITT arrive at **LLOYD'S RESIDENCE** and enter. BRITT remained in **LLOYD'S RESIDENCE** for a brief period of time and then left. As BRITT exited the residence, Investigator Lutz observed BRITT check his surroundings and then conceal an object under his jacket.

103. At approximately 2:25 p.m., shortly after BRITT departed **LLOYD'S RESIDENCE**, the RCSD conducted a traffic stop on BRITT. During a search of the vehicle, deputies located and seized approximately \$15,500.

104. While the RCSD conducted the traffic stop, Investigator Lutz maintained surveillance on **LLOYD'S RESIDENCE**. At approximately 3:36 p.m., Investigator Lutz observed a black Dodge Challenger bearing SC license plate NVR106<sup>37</sup> departing **LLOYD'S RESIDENCE**.

105. Affiant knows that \$15,500 is the approximate street value<sup>38</sup> for 18 ounces of cocaine. Therefore, based on the information received over the court authorized wire interception of **TARGET TELEPHONE 1**, during session 00225, Affiant believes that BRITT sold LLOYD approximately 18 ounces of cocaine on November 18, 2019. Affiant also believes based on this

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<sup>37</sup> According to the SC DMV, the 2018 Dodge Challenger bearing SC license plate NVR106 is registered to Tommy Novack LLOYD, at 1823 Inglewood Drive, Columbia, South Carolina.

<sup>38</sup> Street prices are the current trends regarding quantities and prices for controlled substances for drug dealers and drug users.

information that LLOYD utilizes **LLOYD'S RESIDENCE** as a stash location for his illicit controlled substances.

106. On February 25, 2020, TFO Owens conducted surveillance of **LLOYD'S RESIDENCE**. Upon passing **LLOYD'S RESIDENCE**, TFO Owens observed the same black Dodge Challenger registered to LLOYD (see paragraph 104) parked in the open garage of **LLOYD'S RESIDENCE**. On April 30, 2020, TFO Owens and Affiant again conducted surveillance of **LLOYD'S RESIDENCE**. Upon passing **LLOYD'S RESIDENCE**, TFO Owens and Affiant observed the same black Dodge Challenger registered to LLOYD parked in the open garage of **LLOYD'S RESIDENCE**. Lastly, on June 3, 2020, Agents again observed LLOYD's Dodge Challenger parked in the open garage of **LLOYD'S RESIDENCE**.

107. According to pen register and toll data collected by the FBI, LLOYD continued to stay in telephonic contact BRITT until January 3, 2020 when Agents' pen register and trap trace device on BRITT's phone was terminated. However, newly collected pen register and trap and trace data from LLOYD's phone showed that LLOYD was in regular contact with a phone number belonging to Danielle Daney as recently as June 10, 2020. According to SC DMV, Daney's listed residence is **LLOYD'S RESIDENCE**. It is believed she is a girlfriend of LLOYD and LLOYD utilizes their residence for his drug trafficking activities. Agents do not believe BRITT is still using **TARGET TELEPHONE 1** so it is unknown whether LLOYD and BRITT are still in contact telephonically.

108. Based on calls and other information gathered from this investigation, Affiant believes that LLOYD has documents such as drug ledgers, currency, telephone bills and other information corroborating intelligence intercepted over the court authorized interception of **TARGET TELEPHONE 1**, located at **LLOYD'S RESIDENCE**.

**BALLARD'S RESIDENCE**

(511 Alcott Drive, Apartment 16-A, Columbia, South Carolina, 29229)

109. At approximately 7:49 p.m. on November 19, 2019, during session 03211 on **TARGET TELEPHONE 2**, LEACH made an outgoing call to BALLARD. During the call, LEACH asked, "You at the house?" BALLARD responded, "Yeah, I'm at the house." LEACH asked, "You could uh, get the uh, same weight as before?" BALLARD answered, "Yeah, yeah, yeah, you know I got you." Later during the call, LEACH stated, "Alright, I'm on the way." Then at approximately 8:56 p.m., during session 03219 on **TARGET TELEPHONE 2**, LEACH sent a text message to Christopher MELTON, which read, "Leavin Dave (BALLARD)". According to location data from **TARGET TELEPHONE 2**, LEACH was in vicinity of 511 Alcott Drive, Apartment 16-A (**BALLARD'S RESIDENCE**) at approximately 9:08 p.m.<sup>39</sup> (Affiant believes that LEACH went to **BALLARD'S RESIDENCE** to deliver a previously agreed upon quantity of cocaine to BALLARD. As LEACH was leaving **BALLARD'S RESIDENCE**, he sent a text message to MELTON, who stored LEACH'S narcotics, to inform MELTON that he had just completed the drug transaction with BALLARD.)

110. At approximately 3:49 p.m. on December 13, 2019, during session number 05632, on **TARGET TELEPHONE 2**, LEACH received an incoming call from BALLARD. During the call, LEACH said, "What you got going on?" BALLARD responded, "I ain't doing shit, just cooling. What you know good?" LEACH stated, "Man, you know everything everything on my end baby boy." Later during the call, LEACH stated, "I'm about to jump on the road, what do I need to do?" BALLARD said, "Uh, still one of them." LEACH said, "Alright bet, I got you." According to location data from **TARGET TELEPHONE 2**, LEACH was in vicinity of

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<sup>39</sup> According to the provider, the location of LEACH'S phone had a certainty factor of approximately 9 meters at 9.08 p.m.



**BALLARD'S RESIDENCE** at approximately 5:44 p.m.<sup>40</sup> (Affiant believes that LEACH and BALLARD coordinated the sale of one ounce of cocaine which LEACH later delivered to **BALLARD'S RESIDENCE**.)

111. On February 18, 2020, RCSD narcotics investigators were conducting surveillance at **BALLARD'S RESIDENCE** where they observed a silver Toyota Camry bearing SC license plate QSY814<sup>41</sup>, a vehicle known to be used by BALLARD, which was parked adjacent to the residence. At approximately 1:13 p.m., investigators observed an unknown black male arrive in a gold Mercury Montego and park adjacent to the residence. The unknown black male exited the vehicle, knocked on the door at **BALLARD'S RESIDENCE** and then entered the apartment. Approximately one minute later, the same black male exited **BALLARD'S RESIDENCE** and departed the location in the Mercury Montego. At approximately 1:37 p.m., a red Ford Ranger truck arrived and parked adjacent to the residence. An unknown black male exited the passenger side of the vehicle and knocked on the door of **BALLARD'S RESIDENCE**. Moments later, the same black male exited **BALLARD'S RESIDENCE** and departed in the Ford Ranger. At 1:55 p.m., investigators observed the driver of a silver Chevy Tahoe arrive and depart from **BALLARD'S RESIDENCE** within a matter of minutes. (Affiant believes that BALLARD was conducting drug transactions with the visitors that were rapidly coming and going from his residence.)

112. On February 24, 2020, at approximately 2:10 p.m., RCSD investigators again observed BALLARD'S silver Toyota Camry parked near **BALLARD'S RESIDENCE**. At

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<sup>40</sup> According to the provider, the location of LEACH'S phone had a certainty factor of approximately 31 meters at 5:44 p.m.

<sup>41</sup> According to the SC DMV, SC license plate QSY815 is registered to a 2003 Toyota Camry, owned by David Lanard BALLARD, at 204 Redwood Court Columbia, South Carolina, 29223.

approximately 2:16 p.m., investigators observed an unknown male enter **BALLARD'S RESIDENCE** and then exit several minutes later. At approximately 3:02 p.m., investigator's observed BALLARD exit **BALLARD'S RESIDENCE**, enter his silver Toyota Camry, and then depart the location. On March 3, 2020, at approximately 12:50 p.m., investigators again observed BALLARD'S Toyota Camry at **BALLARD'S RESIDENCE**. At approximately 1:13 p.m., investigators again observed foot traffic of individuals coming and going from **BALLARD'S RESIDENCE**. At approximately 1:34 p.m., investigators observed BALLARD depart the location in his silver Toyota Camry.

113. On March 4, 2020, Agents met with a RCSD confidential human source (hereinafter referred to as Source 4<sup>42</sup>) to conduct an interview. During the interview, Source 4 identified BALLARD as a drug dealer who cooks large quantities of crack cocaine and then sells them out of his residence. Source 4 then identified **BALLARD'S RESIDENCE** as the location where BALLARD cooks and sells his crack cocaine. Source 4 stated that he/she had observed BALLARD cooking crack cocaine at this location on at least five different occasions and within the last six months, Source 4 had seen BALLARD cooking as much as 1/8th of a kilogram of cocaine at one time.

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<sup>42</sup> Source 4 was arrested in August 2018 for Assault and Battery 2<sup>nd</sup> Degree and cooperated in the hopes of getting law enforcement assistance for that charge. Source 4 was also cooperating in order to receive financial benefits. In late June 2019, Source 4 was arrested on a new charge of Assault and Battery 3<sup>rd</sup> Degree. Both pending assault charges were dismissed and Source 4 is still currently working as a RCSD Narcotics Confidential Source. Source 4 also has had previous arrests related to drug charges, assault, and theft. Agents spoke with the Richland County Solicitor about Source 4's pending Assault and Battery charge from August of 2018 and informed the Solicitor of Source 4's cooperation with law enforcement. The Solicitor informed Affiant that this charge would have been dismissed even without Source 4's cooperation. Affiant is not aware of any consideration given for Source 4's June 2019 Assault and Battery charge dismissal. Affiant has been able to corroborate Source 4's information, and that information has proven to be credible.

114. On March 5, 2020, RCSD investigators utilized Source 4 to make a controlled drug purchase of crack cocaine from BALLARD at **BALLARD'S RESIDENCE**. Investigator's provided Source 4 with \$100 and then observed Source 4 enter **BALLARD'S RESIDENCE** and later exit the residence with approximately \$100 worth of crack cocaine. On March 11, 2020, investigators again utilized Source 4 to make a controlled drug purchase from BALLARD at **BALLARD'S RESIDENCE**. On this occasion, investigators provided Source 4 with \$150 and then observed Source 4 enter **BALLARD'S RESIDENCE** and exit with approximately \$150 worth of crack cocaine. Both controlled purchases were field tested by RCSD investigators and tested positive for crack cocaine.

115. On May 1, 2020, at approximately 10:15 a.m., FBI TFO Emmanuel Dejesus observed BALLARD's Toyota Camry (reference paragraph 111) parked next to **BALLARD'S RESIDENCE**. Again, on May 27, 2020, at approximately 12:07 p.m., Agents again observed BALLARD's Toyota Camry parked adjacent to this location.

116. According to pen register data collected by the FBI, BALLARD continued to stay in telephonic contact with other members of the drug trafficking organization following the termination of the Title III wiretaps on December 20, 2019. Specifically, BALLARD was in continual telephonic contact with Eddie Harrison, Jr. as recently as May 26, 2020.<sup>43</sup> Additionally, as recently as May 18, 2020, BALLARD telephonically contacted LEACH's **TARGET TELEPHONE 2**. BALLARD has also been in telephonic contact with MELTON as recently as May 16, 2020.

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<sup>43</sup> Harrison had been identified during the Title III investigation and was intercepted discussing the receipt of ounce quantities of cocaine from BRITT. After identifying Harrison as a street-level cocaine dealer and associate of BRITT, Agents conducted several controlled purchases of cocaine and crack cocaine from Harrison as recently as March 4, 2020.

117. Based on calls and other information gathered from this investigation, Affiant believes that BALLARD has documents such as drug ledgers, currency, telephone bills and other information corroborating intelligence intercepted over the court authorized interception of **TARGET TELEPHONE 2**, located at **BALLARD'S RESIDENCE**.

### **CONCLUSION**

118. Based upon the foregoing, I request that this Court issue the proposed search warrants, pursuant to Federal Rule of Criminal Procedure 41, to allow the search of the listed properties, more particularly described in Attachment A, including residences, garages, exterior properties, sheds and outbuildings, and the seizure of the items described in Attachment B. Based on the above statements, Affiant believes there is probable cause to find that violations of Title 21, United States Code, and Section 846 occurred, and that evidence of such violations (described in Attachment B) will be found in the residences, garages, exterior properties, sheds and outbuildings of the properties.

119. Due to the logistics involved with multiple search warrants at different locations being executed simultaneously, the government requests that the Court authorize execution of the warrants to occur at any time, day or night.

120. Further, with regard to **LEGACY CARIBBEAN BAR AND GRILL, LEACH'S RESIDENCE, ESCOBAR'S RESIDENCE, SIMON'S RESIDENCE, LLOYD'S RESIDENCE**, and **BALLARD'S RESIDENCE** permission is sought to allow the Federal Bureau of Investigation to obtain the assistance of Federal, State or local law enforcement authorities, in executing the search of the properties described in Attachment A. Permission is also sought to allow these parties to seize items identified in Attachment B as well as to take photographs or video of any location, item, or individual at the search site, use water and electrical

power at search site, to set up necessary equipment, and to establish safety perimeters as government Agents deem necessary to accomplish the search.

This affidavit has been reviewed by AUSA Brandon Hinton.

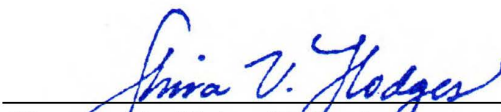
Respectfully submitted,



Special Agent Christian L. Cavaliere  
Drug Enforcement Administration

Sworn this 18th day of June, 2020

This affidavit was sworn to by the affiant, who attested to its contents pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) by telephone after a document was transmitted by email pursuant to Fed. R. Crim. P. 4.1.

  
\_\_\_\_\_  
Honorable Shiva V. Hodges  
United States Magistrate Judge

ATTACHMENT A

Property to be searched

Kitchen Manager's Office at 215 O'Neil Court, Columbia SC 29223

**TARGET SEARCH LOCATION-A**

**Kitchen Manager's Office at Legacy Caribbean Bar and Grill located at 215 O'Neil Court, Columbia, South Carolina** is an office inside a business with grey in color siding and a blue in color roof. The building is located off of Parklane Road. **TARGET SEARCH LOCATION-A** is listed under Richland County GIS parcel # R17005-01-07, legal description: 333.4x338.1x273.3x301.2, #SU, #PR S-113,52-3920, W/S. The search will ONLY include the kitchen manager's office inside the business's building.





Property to be searched

200 Wildwood Lane, Lugoff, SC 29078

**TARGET SEARCH LOCATION-B**

200 Wildwood Lane, Lugoff, SC is a residence that is two story with white in color siding, tan in color shutters, white in color trim and white in color columns. The house is located on Wildwood Lane between Richardson Blvd. and State Rd. S-28-733. **TARGET SEARCH LOCATION-B** is listed under Kershaw County GIS parcel # 295-20-00-006-S58, legal description: James Ward Subdivision Lot 6. The search will include the residence, the lot, all outbuildings and all vehicles parked on the property.



Property to be searched

49 Dovecreek, Columbia, SC 29229

**TARGET SEARCH LOCATION-C**

49 Dovecreek, Columbia, SC is a residence that is one story with red in color brick siding as well as cream in color siding near the roof, with white in color trim, white in color garage door, green in color shutters, green in color front door. House number is gold in color located on the front door. The house is located at the end of Dovecreek. **TARGET SEARCH LOCATION-C** is listed under Richland County parcel # R23105-09-19, legal description: Lot 60, 75x127x75x127. #SU Stone Chapel Village at the Summit Phase I. The search will include the residence, the lot, all outbuildings and all vehicles parked on the property.





Property to be searched

101 Stoneybridge Road, Columbia, SC 29223

**TARGET SEARCH LOCATION-D**

101 Stoneybridge Road, Columbia, SC is a residence that is one story with red in color bricks around the foundation, yellow in color siding, with white in color trim, white in color railings with red in color brick steps, light blue in color front door and a silver in color chain link fence around the back of the property. The house is located on Stoneybridge between William Hardin Rd. and Folkstone Rd.. **TARGET SEARCH LOCATION-D** is listed under Richland County GIS parcel # R17213-06-05, legal description: Lot 11 BLK E, 85x124.7x85x135.7, #SU Folkstone, PR# Y-436. The search will include the residence, the lot, all outbuildings and all vehicles parked on the property.



Property to be searched

4 Pinecroft Court, Columbia, SC 29229

**TARGET SEARCH LOCATION-E**

4 Pinecroft Court, Columbia, SC is a residence that is two story with grey in color siding, white in color trim, white in color garage door, white in color column with a grey in color front door, house number is dark in color located on the front column near the front door. The house is located at the end of Pinecroft Court off of Summit Ridge Circle. **TARGET SEARCH LOCATION-E** is listed under Richland County GIS parcel # R23111-01-25, legal description: Lot 72, 41.1x123.6x181.8x38.5x190.8. The search will include the residence, the lot, all outbuildings and all vehicles parked on the property.





Property to be searched

511 Alcott Drive Building 16 Apartment A, Columbia, SC 29203

**TARGET SEARCH LOCATION-F**

The premise to be searched has a physical address of 511 Alcott Drive which is the Willow Run Apartments. The specific apartment to be searched is apartment 16-A. Building 16 is a two story brick building trimmed with tan vinyl siding. The number 16 is clearly displaced on the front left side of the building. Apartment 16-A is the first door on the bottom left if you enter the breezeway from the parking lot beside building 13. The letter A is clearly displayed by the front door which opens inward. If you are traveling on Fairfield Road, turn onto Winmet Drive. Continue down Winmet until it starts to curve to the right into Willow Run Apartments. Turn right into the parking area by buildings 13 and 14. Drive straight back and building 16 will be located on the left. Apartment 16-A is the bottom left apartment after entering the breezeway.



**ATTACHMENT B**

**PROPERTY TO BE SEIZED**

1. Books, records, receipts, notes, ledgers and other papers relating to the cost of, and profits from, transporting, ordering, purchasing and distribution of controlled substances, in particular, cocaine and/or crack cocaine and other Controlled Dangerous Substances or other criminal activity;
2. Papers, tickets, notes, receipts and other items relating to domestic and international travel;
3. Books, records, invoices, receipts, records of real estate transactions, bank statements and related records, passbooks, money drafts, letters of credit, money orders, bank drafts, and cashier's checks, bank checks, safe deposit box keys, money wrappers, and other items evidencing the obtaining, secreting, transfer and/or concealment of assets and the obtaining, secreting, transfer, concealment and/or expenditure of money. Any safes, or safe deposit boxes contained within the residence, which might contain such books, records, or other items;
4. Electronic equipment, such as computers, telex machines, facsimile machines, currency counting machines, telephone answering machines and related manuals used to generate, transfer, count, record and/or store the information described in items 1, 2, 3 and 4 of this exhibit, and any data contained therein;
5. Cellular telephones and pagers, to include the chargers, and the data contained therein;
6. United States currency, precious metals, jewelry and financial instruments, including stocks and bonds;
7. Photographs, including still photos, negatives, video tapes, DVD's, CD's, films, undeveloped film and the contents therein, slides; in particular, photographs of co-conspirators of assets, firearms, and/or controlled dangerous substances;

8. Address and/or telephone books, rolodex indices and any papers reflecting names, addresses, telephone numbers, pager numbers, fax numbers and/or telex numbers of conspirators, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists;

9. Indicia of occupancy, residency, rental and/or ownership of the premises described herein; including, but not limited to, utility and telephone bills, cancelled envelopes, rental, purchase or lease agreements, keys, etc.;

10. Firearms and ammunition, including, but not limited to, pistols, revolvers, rifles, shotguns, machine guns and other weapons, holsters, bullet proof vests, and any records or items pertaining to firearms and ammunition;

All of the above being fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Section 846.